



45 WEST 29TH STREET, SUITE 303
NEW YORK, NEW YORK 10001
CHAUDHRYLAW.COM

May 17, 2022

BY ECF

The Honorable Judge Sidney H. Stein
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Jennifer Shah, et al., 19 Cr. 833 (SHS)*

Dear Judge Stein:

As the Court is aware, we represent Jennifer Shah in the above-referenced matter which is currently set for trial on July 11, 2022. At the telephone conference on Friday, May 13, 2022, the Court indicated that Ms. Shah's trial—which the parties predict may last 4-5 weeks—may not begin on July 11, or in July at all, due to the Court's schedule. For the reasons set forth below, I respectfully request that, should the Court be unable to begin this trial in July of this year, the Court reassign this matter to another judge whose schedule could accommodate a July start date for Ms. Shah's 4-5-week trial.

First, Ms. Shah was arrested and indicted in March 2021. Her trial was initially set for October 18, 2021, and then moved twice, to March 22, 2022, and July 11, 2022—due to COVID-19 courtroom protocols and courtroom availability. Ms. Shah has always requested the first trial date possible and to that end, in January of this year (when Ms. Shah's trial was set for March 22), I submitted a letter requesting the Court consult the Southern District of New York's Ad-Hoc Committee to ensure that Ms. Shah's trial would either start on March 22, or (if that was not possible) on a firm date in the second quarter of this year. *See* ECF No. 435. Unfortunately, due to courtroom unavailability, we were not able to begin on March 22 or secure a date in the second quarter, and thus Ms. Shah and her counsel have been preparing for a July 11th start date.

Second, though Ms. Shah is not in custody, the continued long delays in her trial date have been extremely difficult for her and her family and have presented an undue hardship. In addition, another delay of Ms. Shah's trial date would pose a significant hardship on my small law firm. In order to effectively prepare for Ms. Shah's trial, which requires months of preparation given the millions of documents produced in discovery, we all have adjusted our schedules and other cases to block out 4-5 weeks in October 2021, then in March 2022, and then again in July 2022. For a firm of our size, this poses a tremendous hardship because we do not

have the resources to constantly reallocate our personnel when we need to be prepared for a trial of this length and complexity. Also, our firm has other potential trials which have been difficult to schedule due to the continued uncertainty of the trial date in this matter.

I do not make this request lightly, but after three successive lengthy delays, we believe that the interests of justice and our client require that the trial in this matter move forward as expeditiously as possible. Based on my own experience, I know that it is not uncommon for cases to be reassigned in this district, even on the eve of trial, when a court's calendar does not permit a trial to commence as scheduled. I am respectfully requesting that Your Honor take this into consideration and reassign the case if possible.

For the reasons set forth above, we respectfully request the Court to begin Ms. Shah's trial in July of 2022 or, if it cannot, then to reassign it to another judge.

Very truly yours,



Priya Chaudhry